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*Attorneys for the Motors Liquidation Company  
GUC Trust Administrator*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	: <b>Chapter 11</b>
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<b>MOTORS LIQUIDATION COMPANY, et al.,</b>	: <b>Case No. 09-50026 (MG)</b>
<b>f/k/a General Motors Corp., et al.</b>	:
	: <b>(Jointly Administered)</b>
<b>Debtors.</b>	:
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**RESPONSE OF WILMINGTON TRUST COMPANY TO  
MOTION TO ALLOW WILMINGTON TRUST TO  
TRANSFER SETTLEMENT DIRECTLY TO ESCROW**

Wilmington Trust Company ("Wilmington"), in its capacity as trust administrator and trustee of the Motors Liquidation Company GUC Trust, submits this response to the *Motion to Allow Wilmington Trust to Transfer Settlement Directly to Escrow* [ECF No 14753] (the "Motion") filed by Attorney David V. Scott as counsel for creditor Billy England.

Wilmington has communicated with Attorney Scott regarding the Motion and the relief requested therein. Wilmington acknowledges that Billy England, Husband and Surviving Spouse of Fannie England, has an Allowed Unsecured Claim (as that term is defined in the Motors Liquidation Company GUC Trust Agreement) in the amount of \$65,000.00 and that no distribution has been made on account of that Allowed Claim. Furthermore, Wilmington takes no position with respect to the laws of intestate succession in the Commonwealth of Kentucky.

Although Wilmington is not opposed to the relief requested in the Motion, it seeks this Court's authority to make a distribution to someone other than the party listed as the creditor holding the Allowed Unsecured Claim. Accordingly, Wilmington requests that the Court conduct a hearing so that the parties can determine, with the Court's input, whether making such a distribution is authorized and appropriate.

Dated: New York, New York  
July 9, 2020

Respectfully submitted,

/s/ Kristin K. Going

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